

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

EDMOND P. LAFRANCE,

Defendant

Criminal No. 16-CR-10090-IT

UNOPPOSED MOTION TO CONTINUE ARRAIGNMENT

Defendant Edmond P. LaFrance, by and through counsel, respectfully submits this Motion to Continue the Arraignment on the Superseding Indictment, which is currently scheduled for July 7, 2016 at 10 a.m.

Counsel for LaFrance has been advised that LaFrance has been admitted to a hospital for treatment for chronic medical conditions, including congestive heart failure and difficulty breathing. It is expected (although not certain) that LaFrance will be discharged on either Thursday or Friday, July 7 or July 8, 2016.

Counsel for the parties have conferred regarding this issue, and Assistant U.S. Attorney Stephen Heymann has indicated that he does not object to resetting the date of the arraignment.

Accordingly, Counsel for LaFrance requests that the Court reschedule the arraignment on the superseding indictment for one of the following dates, or another date that is convenient for the Court: July 13 in the morning, July 20, or July 21.

Respectfully submitted on July 6, 2016.

DEFENDANT EDMOND P. LAFRANCE,

By his attorneys,

/s/ Paul V. Kelly

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CERTIFICATE OF SERVICE

I certify that this document was filed through ECF and will be sent electronically to the registered participants as identified in the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

/s/ Paul V. Kelly

Jackson Lewis P.C.